# POLICY AND PRACTICE WHEN WE COMMENT WHAT WE SHARE



The Society of Authors ('SoA') is a trade union for all types of writers, illustrators and literary translators. Our mission is to empower professional authors and their estates with knowledge, support and community, and to lobby industry and government for an environment that helps sustain and nurture the careers of authors and their work. As such, we lobby, advise and campaign on issues that affect our members in their business dealings as authors.

Over the last two years, SoA staff and the Management Committee (the SoA's board of directors) have conducted an extensive review of what we comment on and how we comment. This document is the result of that review. As this is a new policy, it amends and supersedes past policy, and our practice in some areas now and going forward may be different from what we have done in the past. In short, we only comment on issues within our mission. This allows us to focus our responses, to engage only where we are informed and can make a difference, and to protect our members' freedom of expression.

While we will always advise members individually on a confidential basis about any matters relating to the business of authorship, this policy and practice document outlines the framework we use to collect and assess information before deciding on when we comment or share publicly. The detailed processes we use are contained in this document and the key guidelines we use for assessment are outlined below:

# Key guidelines

When assessing any request to comment publicly, release a statement or share information, we consider a number of different factors including (but not limited to):

- **Mission:** how the issue or challenge fits with our mission of empowering authors.
- Knowledge and influence: whether we know enough to comment, and whether a comment or statement from us can influence the issue or challenge.
- Impact: what the impact or outcome of a public statement would be.
- **Representation:** whether our membership as a whole would be broadly in agreement on the issue or challenge, and with the wording of any statement.
- **Opportunity:** whether members would benefit from a statement raising awareness of an issue.
- Focus: whether it would be better to intervene privately and directly on behalf of a member.
- **Remit:** whether another organisation or individual is better placed to comment or if a statement might have greater impact if made in partnership with other organisations.

- **Capacity:** how much staff capacity we have and the extent to which work on the issue would take away from core work.
- **Timing:** whether we can respond in a meaningful timeframe.
- **Risks:** whether a statement or comment risks making the situation worse or provoke hate. We also need to consider any legal and reputational risks of releasing a statement or comment.
- Impact on members: whether our comment threatens our members' rights to comment freely on any issue.
- **Reputation or endorsement:** whether a statement from the SoA would unintentionally endorse an opinion, product or service.
- **Precedent:** whether releasing a seemingly uncontentious statement or comment in one case would create an expectation that we would comment on all such cases in the future.

In practice, our immediate response to any request to comment or share may be 'it depends'. We consider all requests thoughtfully and will always enter into private dialogue and provide a clear and reasoned explanation of our decision-making process and position to any member who asks us. We will not enter into public debate on our reasons for responding, or not, on any issue.

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# 1. Policy Scope

This document applies to comments, statements and information shared on communications channels and social media accounts owned by the Society of Authors. It does not apply to information that staff, volunteer officeholders or representatives share on personal accounts. For information on this, see our guidance: *Who Speaks for the SoA.* Furthermore, opinions expressed in our quarterly magazine, *The Author*, are those of the contributor or editor and do not necessarily represent those of the SoA and we make this clear by a statement in the magazine.

# 2. Policy Introduction

The Society of Authors ('SoA') is regularly asked to comment publicly or release a statement about our position on a broad range of subjects. We are also regularly asked or might wish to share third-party information on behalf of other organisations or individuals. Deciding when and how to comment or share information publicly is not always obvious. This document offers an overview of our general approach, as well as some of the considerations that aid the decision-making process.

In practice, our immediate response to any request may be 'it depends'. We consider all requests thoughtfully and will always enter into private dialogue and provide a clear and reasoned explanation of our decision-making process and position to any member who asks us. We will not enter into public debate on our reasons for responding or not on any issue, but we are always pleased to advise members individually on a confidential basis about matters relating to the business of authorship.

Over the last two years, SoA staff and the Management Committee (the SoA's board of directors) have conducted an extensive review of what we comment on and how we comment. This document is the result of that review. As this is a new policy, it amends and supersedes past policy, and our practice in some areas now and going forward may be different from what we have done in the past.

This document is not intended to be exhaustive, and we will review and update it as appropriate.

# 3.Policy – When We Comment

This section explains when and why the SoA does or does not comment publicly on issues, and in what circumstances.

The SoA is a trade union for all types of writers, illustrators and literary translators. Our mission is to empower professional authors and their estates with knowledge, support and community, and to lobby industry and government for an environment that helps sustain and nurture the careers of authors and their work. As such, we lobby, advise and campaign on issues that affect our members in their business dealings as authors.

As a not-for-profit organisation with limited resources, we need to focus our actions where we can make a positive difference. We work to protect the livelihoods and working conditions of authors and creators so that they can focus on their creative work. This includes lobbying and campaigning to improve the rights and working conditions of every type of author, be they poets, translators, writers or illustrators. It also means informing authors and directing them to tools and resources that might assist their professional work. Our recent <u>News pages</u> shows the types of issues we share and comment on.

### 3.1 Sharing information

We share a wide range of SoA information: on our website, in our newsletters and on our social media channels. SoA information forms the bulk of our communications.

We do not usually share links to paid-for services provided by others, nor do we share work by our own members on any of our platforms or channels. We are keen to maintain a reputation for independence and to avoid showing preferential treatment to any individual service provider or individual. For this reason we do not share members' news. However, if someone publishes a post in support of the SoA or something that supports or aligns with our position, then we might like or share that.

As a benefit of membership, we also host private Facebook discussion groups for SoA members only. We have rules on what our members can share on those groups. For this information, see the section at the end of this policy on 'User-Generated Content'.

### 3.2 Advocacy and campaigning

We represent the collective interests of our members: we speak out publicly on issues that affect the rights and interests of authors, where it is likely that there would be majority consensus from within our membership (e.g. <u>Spotify streaming deal - send a letter to your publisher</u>).

With over 12,400 members, the SoA includes authors from every background, working at every career stage, in every genre, and who are driven by a full spectrum of experience and opinion. The SoA must therefore tread a fine line when considering whether to comment. If issues arise over which our membership would be divided, we would be unlikely to comment publicly as we are mandated to represent the collective voice of our membership.

We can make the most difference, and we are most informed, in our focused and prioritised areas of specialism. We must focus our efforts on issues within our remit that relate to the business of authors.

### 3.3 Protecting the individual interests of authors

We support members in relation to their individual business dealings with agents, publishers, producers and others: we advise members individually and privately with bespoke and confidential advice. If a member asks us for assistance, and if it is in relation to their business as an author, we advise and support them confidentially and privately – not in the public domain. Our approach is to find out the facts and, if the issue is within our remit of supporting authors in their business dealings, we would support the member privately, which, from our experience, is more likely to result in creating a meaningful resolution for that author than would making a public statement. However, we may make a general statement, with a member's consent, and on knowing all the facts, if the matter raises a general issue (e.g. SoA and CWIG respond to cancellation of LGBTQ+ author's school visit).

### 3.4 General political issues

We are sometimes invited to comment publicly, or to release statements, on issues of a more general political nature, not directly or primarily related to authors. The SoA is a trade union for authors: our mission is to empower professional authors and their estates with knowledge, support and community, and to lobby industry and government for an environment that helps sustain and nurture the careers of creators and their work. We do not comment on party politics. For example, we did not express a view on which way to vote in the Brexit referendum, our <u>comments</u> focussed on the impact on the business of authors.

#### 'We do not comment on areas outside our remit in order to protect the right to freedom of expression of individual members.'

We do not comment on areas outside our remit in order to protect the right to freedom of expression of individual members. The SoA is not a human rights organisation, nor a free speech organisation. If appropriate, we would follow the lead of organisations that are at the forefront of these issues, such as <u>PEN</u>, <u>Amnesty</u> <u>International</u> and <u>Human Rights Watch</u>. We would consider sharing campaigns, information and news from these organisations if it aligns with our policy below on

'In Practice – What We Share' (e.g. this <u>English Pen blog</u> and on <u>Freedom of Speech</u> <u>issues</u>).

# 4. In Practice – When We Comment

# When considering whether the SoA should comment publicly or release a statement, staff will:

Assess the request: whether it is an industry issue or challenge that could affect a section of the SoA membership and aligns with our guidelines for assessment below. If an individual author asks us for assistance, we will always try to find out the facts and, if the issue is within our remit, we will support the member privately.

- Review the information: research the issue and ask questions.
- **Discuss it with colleagues:** if needed we would escalate the discussion to the Management Committee (the SoA's board of directors) and particularly with those who are likely to have an informed view.
- We will not comment or release a statement without properly understanding the issue or challenge first: we receive our mandate from members, and our activities are subject to the approval of members via their elected representatives – the Management Committee (the SoA's board of directors). This means that we may need to take the issue to the board before deciding. We appreciate that social media and news move quickly, but our approach and reputation rest on us being informed and considered.

### 4.1 Requests for comment

#### To journalists, members and others:

We can only deal with requests to release statements in relation to issues or challenges to do with the business of authorship.

Please note that the SoA's groups and networks do not release statements without discussion with the SoA's Policy and Public Affairs team and Comms team. If any of our groups or networks receive requests for the SoA to release a statement, they will pass this to the central team for consideration.

If, as an individual member or group of members, you would like the SoA to consider releasing a statement on a particular issue or challenge on an SoA platform, we ask that you review the Key Guidelines listed at the beginning of this policy to consider if the issue or challenge is within the SoA's remit and aligns with the present policy. After reviewing these considerations, if you feel that the SoA should consider releasing a statement, please get in touch using the email contacts below:

- For policy-related requests, contact: <u>PublicAffairs@societyofauthors.org</u>
- For press-related requests, contact: <u>communications@societyofauthors.org</u>

In order to properly assess your request, please provide:

- Your full name and the group you represent (if applicable)
- Your SoA ID number
- Full details of the issue or challenge
- How you feel this issue or challenge would be resolved

We may ask for supporting information or material in order to understand the situation or issue raised.

If we feel that it is appropriate for the SoA to release a statement or comment on the issue raised, we will work with you (the member who has raised the query) on the draft text of the statement. Any statement or comment will need to be approved via our normal channels.

### 4.2 How we do this

When assessing any request to comment publicly or release a statement, we have regard to a number of different considerations, which include (but are not limited to):

- **Mission:** how the issue or challenge fits with our mission of empowering authors.
- Knowledge and influence: whether we know enough to comment, and whether a comment or statement from us can influence the issue or challenge.
- Impact: what the impact or outcome of a public statement would be.
- **Representation:** whether our membership as a whole would be broadly in agreement on the issue or challenge, and with the wording of any statement.
- **Opportunity:** whether members would benefit from a statement raising awareness of an issue.
- Focus: whether it would be better to intervene privately and directly on behalf of a member.
- **Remit:** whether another organisation or individual is better placed to comment or if a statement might have greater impact if made in partnership with other organisations.
- **Capacity:** how much staff capacity we have and the extent to which work on this issue would take away from core work.
- **Timing:** whether we can respond in a meaningful timeframe.
- **Risks:** whether a statement or comment risks making the situation worse or provoke hate. We also need to consider any legal and reputational risks of releasing a statement or comment.
- Impact on members: whether our comment threatens our members' rights to comment freely on any issue.
- **Reputation or endorsement:** whether a statement from the SoA would unintentionally endorse an opinion, product or service.

• **Precedent:** whether releasing a seemingly uncontentious statement or comment in one case would create an expectation that we would comment on all such cases in the future.

If we choose to make a public comment or release a statement, there are many ways we might do this. These include, but are not limited to our:

- Website
- Social media
- Newsletters
- The Author
- Community channels (such as group newsletters or Facebook groups)
- Speaking to the press and media

### 4.3 The process

The drafting and approval process for releasing a statement or making a public comment will depend on the nature of the issue. Whatever the issue, we set a timeframe to draft, review, sign-off and publish or otherwise share any comment or statement before we start work on it. This will reflect the urgency for the comment or statement and how it will be shared.

For instance, our events notices may only be signed off by the Communications and Events team jointly; and a request for comment from *The Bookseller*, the press or broadcast media about a policy issue will often be drafted by the Communications team, shared with the Policy team and Chief Executive for review and reworking, then signed off by the Chief Executive.

In contrast, for a comment on a more complex issue – or criticisms of the SoA itself – while an initial draft will be produced by the Communications team or other staff, the review and editing process is likely to involve members of the Management Committee (the SoA's board of directors) as well as senior staff from the relevant team and may need to follow our internal *Crisis Communications Protocol*.

A press request will often require a response within hours, while a non-reactive statement – potentially drafted in partnership with other organisations – might be drafted and reviewed over weeks, and sometimes months in advance.

In all cases, we have internal protocols to make clear who is responsible for shepherding the statement through each stage of the process, and who will be responsible for approving it.

In short, the specific process and level of sign-off required will be decided on a caseby-case basis dependant on the nature of the issue. All external communications, however anodyne, will be seen and approved by at least two staff members before release.

This rigorous process aims to ensure that we can be confident that any public comment or statement that we publish represents the views of the SoA and our members' interests, and that it is accurate and error-free.

# 5.Policy - What We Share

The SoA often shares information about third-party activities and offers. However, we are under no obligation to share everything we are asked to, even when the request comes from a close strategic partner.

Requests range from sharing information about partners' campaigns and events, to sharing author-related news stories in the trade and national press, or information sent to us from members. Sometimes we see information that looks like it might be of use to members. Sometimes we are asked to share the information by individuals and organisations.

When it comes to specific requests, the organisations asking us to share might be coming from a perspective of common purpose (for instance, the <u>Authors' Licensing</u> <u>and Collecting Society</u> or the <u>Royal Society of Literature</u> asking us to share their campaigns), but it could as easily be an organisation that simply wants access to sell to our members.

When considering whether to share third-party information, we will assess whether the request:

- Aligns with the SoA's mission and values.
- Helps the SoA to progress its strategic priorities.
- Directly benefits SoA members.
- Fits with SoA schedules and does not clash with or detract from planned activities.
- Is presented with full information that is transparent, up-to-date and comprehensive.

Please note that competition law prevents us from recommending rates or fees, although we do provide <u>observed rates and links to resources</u> to help members negotiate payments. We also do not publish a 'blacklist' of organisations or individuals such as publishers, agents or any other service providers.

We do not usually share links to paid-for services provided by others nor to work by our own members (except for paid ads in *The Author* - see below). On request, we might be able to signpost members to directories of service providers held independently online.

We are keen to maintain a reputation for independence and to avoid favouring particular members. For this reason we do not share members' news. However, if someone publishes a post in support for the SoA or something that supports or aligns with our position, then we might like or share that on social media.

Publication of any advertisement in *The Author* or sharing of any third-party information or services does not imply endorsement by the SoA. The SoA accepts no responsibility for products, goods or services that may be advertised or referred to. All prices advertised or provided are accepted in good faith as being correct at the time of publication. However, those who advertise in our quarterly magazine, *The Author*, are required to provide two independent references from authors who have used their services. We reserve the right to refuse an advertisement if we have specific concerns about what is being offered, or the company making the offer. Advertisements for accommodation do not require references.

Any information shared should be transparent and follow good practice guidelines and a commitment to the Advertising Standards Authority (ASA) codes of conduct. If third parties are not working in line with the following Misleading Advertising clauses from Section 03 of the non-broadcast code, it will not be shared on any of our platforms. See namely Sections 3.1, 3.3, 3.4.6. and 3.17 of the ASA code of conduct regarding Misleading Advertising:

3.1. Marketing communications must not materially mislead or be likely to do so.
3.3. Marketing communications must not mislead the consumer by omitting material information. They must not mislead by hiding material information or presenting it in an unclear, unintelligible, ambiguous or untimely manner.
3.4.6. that consumers have the right to withdraw or cancel.
3.17. Price statements must not mislead by omission, undue emphasis or distortion.

### 5.1 Disclaimer

Any third-party information that we share is for general information purposes only. We have a disclaimer on our website that states:

"The information might be displayed on the <u>Society of Authors' website</u> and while we endeavour to ensure the information is up-to-date and correct, we make no representations or warranties of any kind, express or implied, about the completeness, accuracy, reliability, suitability or availability with respect to the thirdparty information, products or services. Any reliance placed on such information is therefore strictly at your own risk.

In no event will we be liable for any loss or damage including without limitation, indirect or consequential loss or damage, or any loss or damage whatsoever arising from loss of data or profits arising out of, or in connection with, the use of this thirdparty information.

By clicking on a link, you are able to link to other websites which are not under the control of the Society of Authors. We have no control over the nature, content and availability of any third-party sites. The inclusion of any links does not necessarily imply a recommendation or endorse the views expressed within them.

Every effort is made to keep the website and the information we share up to date. However, the Society of Authors takes no responsibility for, and will not be liable for, the website or link being temporarily unavailable due to technical issues beyond our control".

### 5.2 Privacy Statement

Those accessing and interacting with the SoA website agree to our <u>Terms of Use</u>, which together with our <u>Privacy Statement</u>, govern the SoA's relationship with service users.

# 6.In Practice - What We Share

Whenever we consider sharing another organisation's information – whether on one of the SoA's communications channels, in a community newsletter, or anywhere else – we will:

- 1. Review the information: research it and ask questions.
- 2. Discuss it with colleagues: particularly those likely to have an informed view.
- 3. Not share something without properly understanding it.
- 4. Properly consider our decisions: even if we are being pressed for a response.
- 5. Escalate the request: if needed in order to decide.

This decision-making process not only applies to third-party information shared by the Communications team on the main SoA channels, but also to the information we share with our groups and networks, resources we link to in guides, and to a degree, the third-party information we share via email or other means with members and others.

If we choose to share a piece of information, there are many ways it might be shared, including (but not limited to) our:

- Website
- Social media
- Newsletters
- The Author (as information or as paid advertisements)
- Guides and resources
- Community channels (such as group newsletters or Facebook groups)
- Email
- Word-of-mouth
- Press and media

We will include a disclaimer about any information we share, which makes it clear that we are not responsible for the content of external links. However, we appreciate that this is not a get-out-of-jail-free card and that we are responsible for due diligence before we share anything on any of our platforms. Furthermore, we are mindful that people trust the SoA, and so when we do share a link or information that fits in with this policy – disclaimer or not – we understand that people are more likely to trust it than if they find the information elsewhere.

# 7.User-Generated Content

Members are encouraged to be respectful of others if they share their professional experiences, both positive and negative, and to broaden discussion, support each other, and network with fellow members in our private online spaces.

Each Facebook discussion group has the same terms, which apply to any material members post within that forum – whether words, images, videos, audio or other formats. For further information see this <u>guidance on User-Generated Content</u>.

Members are asked to remain kind and courteous, respect others, and refrain from posting irrelevant links, heavy promotion or spam. Hate speech and bullying are not tolerated. For further information see our <u>Dignity and Respect guidance</u>.

We would currently consider one promotional post about any one thing to be acceptable from members on our Facebook discussion groups. It may be that over time a member may promote the same book etc more than once if there is a new event related to it, a new edition, a TV or radio adaptation or some other news.

This policy is in place to protect members from spam. Our Facebook moderators (volunteer committee members or staff) may remove multiple mentions of the same book etc. if they are posted close together in time.

If members wish to comment about something they previously posted, they can do this by adding a comment to the original post, which then brings the post to the top of people's timeline. Any mis-use of the comment function may mean that posts are removed.

Please note that our Facebook discussion groups are often moderated by member volunteers on our Committees.

# 8.Feedback

If you have feedback on this policy or approach, please <u>get in touch</u>. Thank you.